

File No.: 11781

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	Case No. 18-21199 JAD
	:	
Delmas F. Fresh and April D. Fresh,	:	Chapter 13
	:	
Debtors,	:	Related to ECF No. 92
	:	
Delmas F. Fresh and April D. Fresh,	:	
	:	
Movants,	:	
	:	
vs.	:	
	:	
No Respondents.	:	

CONSENT ORDER GRANTING SUBSTITUTION OF ATTORNEY

Notice is hereby given that, subject to approval by Court, Debtors, Delmas F. Fresh and April D. Fresh, hereby request to substitute Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr, 1310 Morrell Avenue, Suite C, Connellsville, PA 15425 as Counsel of Record in place of Daniel R. White, Esquire and Zebley, Mehalov & White, P.C., 18 Mill Street Square, Uniontown, PA 15401.

Contact information for new Counsel is as follows:

Firm Name: Tremba, Kinney, Greiner & Kerr

Address: 1310 Morrell Avenue, Suite C, Connellsville, PA 15425

Telephone: 724-628-7955

Email: dwhite@westpalawyers.com

We, the Debtors in this case, consent to the above substitution and hereby assign all remaining, unpaid and future legal fees (inclusive of balances outstanding on no-look fees and fee applications whether approved or outstanding) due to be paid to Daniel R. White, Esquire and Zebley Mehalov & White, P.C. as of the date of this Order, instead to be remitted to Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr and that the distribution of fees to Zebley, Mehalov & White, P.C. is terminated as of December 31, 2023. The terms of the new representation

shall be identical to the terms of the original retainer agreement with Zebley, Mehalov & White, P.C., assigning all rights and obligations from Zebley, Mehalov & White, P.C. to Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr. We have signed a new fee agreement with Tremba, Kinney, Greiner & Kerr.

/s/ Delmas F. Fresh

Delmas F. Fresh, Debtor

/s/ April D. Fresh

April D. Fresh, Joint Debtor

The law firm of Zebley, Mehalov & White, P.C. consents to being substituted and hereby assigns all remaining, unpaid and future legal fees (inclusive of balances outstanding on no-look fees and fee applications whether approved or outstanding) due to be paid to Daniel R. White, Esquire and Zebley, Mehalov & White, P.C., as of the date of this Order, instead to be remitted to Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr and to terminate the distribution to Zebley, Mehalov & White, P.C. as of December 31, 2023. The terms of the new representation shall be identical to the terms of the original retainer agreement with Zebley, Mehalov & White, P.C., assigning all rights and obligations from Zebley, Mehalov & White, P.C. to Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr.

/s/ Charles O. Zebley, Esquire

Charles O. Zebley

/s/ Mark M. Mehalov, Esquire

Mark M. Mehalov

/s/ Daniel R. White, Esquire

Daniel R. White

Current Counsel of Record, Daniel R. White, Esquire consents to the above substitution and agrees that all remaining, unpaid and future legal fees (inclusive of balances outstanding on no-look fees and fee applications whether approved or outstanding) due to be paid to Daniel R. White, Esquire and Zebley, Mehalov & White, P.C. as of the date of this Order, instead to be remitted to Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr and that the distribution of fees to Zebley, Mehalov & White, P.C. is terminated as of December 31, 2023. The terms of the new representation shall be identical to the terms of the original retainer agreement with Zebley, Mehalov & White, P.C., assigning all rights and obligations from Zebley, Mehalov & White, P.C. to Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr.

/s/ Daniel R. White, Esquire

Daniel R. White

The Chapter 13 Trustee, Ronda J. Winnecour, consents to the above substitution, agrees that all remaining, unpaid and future legal fees (inclusive of balances outstanding on no-look fees and fee applications whether approved or outstanding) due to be paid to Daniel R. White, Esquire and Zebley, Mehalov & White, P.C. as of the date of this Order, and are directed instead to be remitted to Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr at 1310 Morrell Avenue, Suite C, Connellsville, PA 15425 and that the distribution of fees to Zebley, Mehalov & White, P.C. is terminated as of December 31, 2023.

/s/Owen W. Katz

Office of the Chapter 13 Trustee

US Steel Tower, Suite 3250

600 Grant Street

Pittsburgh PA 15219

(412) 471-5566 x3124

okatz@chapter13trusteedpa.com

The substitution of attorney is hereby approved and so Ordered this 14th day of February, 2024. Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr are approved as Attorney of Record.



JEFFERY A. DELLER^{jah}

UNITED STATES BANKRUPTCY JUDGE

FILED

2/14/24 9:18 am

CLERK

U.S. BANKRUPTCY

COURT - WDPA

In re:
Delmas F. Fresh
April D. Fresh
Debtors

Case No. 18-21199-JAD
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0315-2
Date Rcvd: Feb 14, 2024

User: auto
Form ID: pdf900

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
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+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
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Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Feb 16, 2024:

Recip ID	Recipient Name and Address
db/jdb	+ Delmas F. Fresh, April D. Fresh, 267 Hardin Hollow Road, Smithfield, PA 15478-1527

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Feb 16, 2024

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on February 14, 2024 at the address(es) listed below:

Name	Email Address
Daniel R. White	on behalf of Joint Debtor April D. Fresh lori@zeblaw.com;r63228@notify.bestcase.com;elisa@zeblaw.com;ethomas@westpalawyers.com;kcostello@westpalawyers.com
Daniel R. White	on behalf of Debtor Delmas F. Fresh lori@zeblaw.com;r63228@notify.bestcase.com;elisa@zeblaw.com;ethomas@westpalawyers.com;kcostello@westpalawyers.com
Denise Carlon	on behalf of Creditor Toyota Motor Credit Corporation dcarlon@kmlawgroup.com
Nicholas Godfrey	on behalf of Creditor Clear Mountain Bank nicholas.godfrey@dinsmore.com christina.lee@dinsmore.com
Office of the United States Trustee	ustpregion03.pi.ecf@usdoj.gov

District/off: 0315-2

User: auto

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Date Rcvd: Feb 14, 2024

Form ID: pdf900

Total Noticed: 1

Ronda J. Winnecour

cmecf@chapter13trusteedpa.com

TOTAL: 6